UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: JAMES MICHAEL LITTLE	:	CHAPTER 13
Debtor	:	
	:	
JACK N. ZAHAROPOULOS	:	
STANDING CHAPTER 13 TRUSTEE	:	
Movant	:	
	:	
vs.	:	
	:	
JAMES MICHAEL LITTLE	:	
Respondent	:	CASE NO. 1-23-bk-02273

<u>TRUSTEE'S OBJECTION TO FOURTH AMENDED CHAPTER 13 PLAN</u>

AND NOW, this 25th day of November 2024 comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtor's plan for the following reason(s):

1. Debtor's plan violates 11 U.S.C. §§ 1322(a)(1) and 1325(b) in that the debtor has not submitted all or such portion of the disposable income to the Trustee as required. More specifically, the debtor's vehicle is being paid through the plan; accordingly, Schedule J should not list a vehicle payment.

2. Income from new job making $27.00 an hour and 40 hours per week is not reflected on Schedule I.

3. Trustee avers that debtor's plan cannot be administered due to the lack of the following:

   a. Recent pay stub (Debtor obtained new employment after filing)

WHEREFORE, Trustee alleges and avers that debtor's plan cannot be confirmed, and therefore Trustee prays that this Honorable Court will:

   a. Deny confirmation of debtor(s) plan.
   b. Dismiss or convert debtor(s) case.
   c. Provide such other relief as is equitable and just.

Respectfully submitted:

Jack N. Zaharopoulos
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717) 566-6097

BY: /s/Douglas R. Roeder
        Attorney for Trustee

<p style="text-align: center;">CERTIFICATE OF SERVICE</p>

AND NOW, this 25th day of November 2024, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

MICHAEL A CIBIK, ESQUIRE
CIBIK LAW, PC
1500 WALNUT ST, SUITE 900
PHILADELPHIA, PA   19102-

<div style="margin-left: 50%;">

/s/Tammy Life
Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee

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